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*Attorneys for Plaintiff*  
*SUSTAINABLE MODULAR MANAGEMENT, INC.*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA, for the use and benefit of SUSTAINABLE MODULAR MANAGEMENT, INC., a Texas corporation	)	Case No. 2:20-cv-00790-JAD-NJK
	)	
Plaintiff,	)	<b>PLAINTIFF'S SECOND</b>
v.	)	<b>UNOPPOSED MOTION FOR</b>
	)	<b>EXTENSION OF TIME TO</b>
JE DUNN CONSTRUCTION COMPANY; FEDERAL INSURANCE COMPANY; HARTFORD FIRE INSURANCE COMPANY; TRAVELERS CASUALTY AND SURETY COMPANY OF AMERICA; DOE Individuals I-X and ROE Entities I-X, inclusive,	)	<b>ANSWER JE DUNN'S COUNTERCLAIM</b>
	)	
Defendants.	)	<b>SECOND REQUEST</b>
	)	

UNITED STATES OF AMERICA, for the use and benefit of  
SUSTAINABLE MODULAR MANAGEMENT, INC. ("Plaintiff" or "SMM")

1 files its Second Unopposed Motion to Extend Time to Answer JE Dunn  
2 Construction Company's ("JE Dunn") Counterclaim (the "Counterclaim"),  
3 and in support thereof, would respectfully state as follows:

4 1. Plaintiff's answer to the Counterclaim (Dkt. 25) is currently due  
5 by extension on July 29, 2020.

6 2. Plaintiff requested an extension to its deadline to answer JE  
7 Dunn's Counterclaim until August 10, 2020 because counsel for Plaintiff's  
8 minor child and immediate family member has tested positive for Covid-  
9 19. Counsel for Plaintiff is addressing the issues inherent in this diagnosis,  
10 and is self-quarantining as well.

11 3. JE Dunn granted the extension and authorized the undersigned  
12 counsel to represent that it is not opposed to this request for an extension  
13 of time.

14 4. Accordingly, Plaintiff respectfully requests an extension of time  
15 until and including August 10, 2020 to respond to the Counterclaim.

16 MORRIS LAW GROUP

17 By: /s/ MICHAEL S. ALFRED

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25 IT IS SO ORDERED.

26 Dated: July 30, 2020

27   
28 Nancy J. Koppe  
United States Magistrate Judge

*Attorneys for Plaintiff*  
SUSTAINABLE MODULAR  
MANAGEMENT, INC.